

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division

JASON L. MEDLIN

Plaintiff,

v.

UNITED STATE OF AMERICA

Defendant.

Case No. 2:25-cv-115

JOINT PROPOSED DISCOVERY PLAN

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Pursuant to Federal Rule of Civil Procedure 26, Local Civil Rule 26 and the Scheduling and Pretrial Order entered in this matter (ECF No. 14), Plaintiff Jason L. Medlin (“Plaintiff”), and Defendant United States of America (“Defendant”), by and through their undersigned counsel, state as follows for their Joint Proposed Discovery Plan.

1. **Rule 26(f) Conference:** The Parties conducted their Rule 26(f) conference on June 13, 2025.

2. **Initial Disclosures:**

The parties served initial disclosures pursuant to Rule 26(a)(1)(C) and will supplement them in accordance with the Rule.

3. **Fact Discovery:**

a. The parties propose that all written fact discovery shall be served sufficiently in advance of **Friday, March 20, 2026**, so that responses are due on or before that date.

b. The parties propose that, except for good cause, oral discovery shall be completed by **Friday, April 10, 2026**.

c. The parties have agreed that it is unnecessary to organize defendant's initial discovery to focus on possible discretionary function defenses. They have further agreed that, to the extent possible, they will focus their initial efforts on preparing for early mediation.

4. **Expert Discovery:** The parties propose the following schedule for expert disclosures pursuant to Rule 26(a)(2):

Disclosures by Plaintiff:	January 21, 2026
Defendant's Disclosures:	February 20, 2026
Rebuttal Disclosures:	March 9, 2026

The parties propose that expert depositions pursuant to Rule 26(b)(4) be completed by **Friday, April 10, 2026.**

5. **Pretrial Deadlines:**

The trial of this matter is scheduled to commence on **Monday, May 4, 2026 at 10:00 a.m.**, the Final Pretrial Conference is scheduled for **Monday, April 27, 2026 at 10:00 a.m.**, and the proposed final pretrial order must be submitted to the Court not later than **Wednesday, April 22, 2026.**

The parties request that the Court modify certain pretrial deadlines in paragraphs 13, 14 and 19 of the Scheduling and Pretrial Order (ECF No. 14), and propose as follows:

a. Proposed findings of fact and conclusions of law shall be filed by the parties not later than **Wednesday, April 22, 2026;**

b. Written stipulations of uncontroverted facts shall be signed by each counsel and filed with the Clerk not later than **Wednesday, April 22, 2026;** and

c. Pretrial bench briefs on material issues expected to arise at trial shall be filed by the parties not later than **Wednesday, April 22, 2026;**

d. The parties shall meet and confer in a good faith effort to enter into written stipulations of uncontroverted facts not later than **Monday, April 10, 2026.**

6. **Joinder of Parties:** At this time, the parties do not anticipate joinder of additional parties but reserve the right to join additional parties should subsequent circumstances warrant it.

7. **Amendment of Pleadings:**
The parties do not anticipate amendment of pleadings, but reserve the right to move the Court for leave to amend should subsequent circumstances warrant it.

8. **Preservation of Discoverable Information:** The parties understand the importance of preserving discoverable information.

9. **Electronically Stored Information:** The parties agree to work in good faith to coordinate the form and manner of production of electronically stored information.

10. **Claims of Privilege & Protection of Trial Material:**
The parties are satisfied with the form of standard privilege logs required pursuant to Rule 26(b)(5)(A). The Defendants agree to comply with Rule 26(b)(5)(A).

11. **Protective Order:** The parties will work together to agree on a form for a protective order as necessary.

12. **Magistrate Judge:** The parties have not consented to trial before a magistrate judge at this time.

13. **Settlement:** A settlement conference is scheduled with Judge Krask for September 15, 2025 at which the parties will endeavor to conclude the matter by way of settlement.

14. **Discovery Limitations:**
The parties do not propose any additional discovery limitations not already provided by the Federal Rules of Civil Procedure or the Local Civil Rules.

Dated: August 11, 2025
Norfolk, VA

Respectfully submitted,

/s/ James L. Chapman, IV

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